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	BANKRUPTCY COURT E C E 1 V E TRICT OF NEW YORK JUL 2 6 2010
In re:) Chapter 11 us BankRibetcy COURT
BEARINGPOINT, INC., et al.,) Case No. 09-10691 (REG)
Debtors.) (Jointly Administered)
))

LINK2GOV'S RESPONSE TO DEBTORS' ELEVENTH OMNIBUS OBJECTION TO PROOFS OF CLAIM NO LIABILITY CLAIMS

Link2Gov Corp. ("Link2Gov"), by its attorneys Andrew A. Jones and Whyte Hirschboeck Dudek S.C., hereby files this Response to BearingPoint, Inc.'s ("BearingPoint") Eleventh Omnibus Objection to Proofs of Claim (the "Objection") whereby BearingPoint denied liability for the claim filed by Link2Gov. In support of its claim, Link2Gov states as follows:

BACKGROUND

1. In August 2008, September 2008, and February 2009 Link2Gov provided goods and/or services to BearingPoint totaling \$20,471.50. Link2Gov then issued invoices requesting payment for these services (the "Invoices") (attached hereto as Ex. A). The Invoices were sent

via e-mail to Terry Stanley at the following email address: terry.stanley@bearingpoint.com. This email address is the last known email address used by the Debtor for receipt of invoices from Link2Gov. According to the records of Link2Gov, the Invoices remain unpaid.

- 2. On April 15, 2009, Link2Gov properly and timely submitted a Proof of Claim for the Invoices in these Chapter 11 proceedings (the "Claim"). On June 29, 2010, the Debtor filed the Objection.
- 3. BearingPoint has failed to provide any detail, evidence, or other factual background as to the basis of its Objection other than an unsupported declaration that the amount of the Claim is not owed by the Debtor.

RELIEF REQUESTED

4. Link2Gov respectfully requests that this Court deny the Debtor's Objection and grant payment of the Claim.

BASIS FOR RELIEF REQUESTED

- 5. Link2Gov renews its claim that the Invoices remain unpaid and that the Debtor owes Link2Gov \$20,471.50. The Claim should be paid by the Debtor as part of the Debtor's liquidation or reorganization plan.
- 6. The Debtor has failed to provide any detail, evidence, or factual background in its Objection for the proposition that the amount of the Claim is not owed by the Debtor. The Debtor has not claimed, nor has it provided any evidence to show that the goods and/or services included in the Invoices were not received by the Debtor, or, in the alternative, that the Debtor is

not obligated to pay the amount due under the Invoices. Further, the Debtor has failed to provide

evidence of payment of the Invoices. Although Link2Gov has provided evidentiary support for

its Claim in the form of the Invoices, the Debtor has only offered an unsupported declaration that

the Claim is not owed. Such a declaration is insufficient to support an objection to the Claim.

Absent any evidentiary support that the Debtor does not owe Link2Gov the amount of the Claim,

it should be assumed that the Invoices remain unpaid and the Claim should be allowed.

For the foregoing reasons, the Debtor's Objection to Link2Gov's Claim should be denied,

and the claim should be allowed.

Respectfully, submitted this 22nd day of July, 2010.

WHYTE HIRSCHBOECK DUDEK S.C.

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Andrew A. Jones, Esq.

By:

Andrew A. Jones (AJ5623)

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EXHIBIT A

LINK2GOV/Metavante 5430 Data Court, Suite 100 Ann Arbor, MI 48108 (734) 222-2000

LINK #GOV

Invoice Number: 34086511 Page: 1 of 1 Invoice Date: 03/12/2009

Metavante

Services for the month of February 2009

INVOICE

Bearing Point, inc.

Account Number: Account Executive: Territory: Terms:

607430 Rob Lundy (RL)

ATTN: Terry Stanley

Due On Receipt

QTY Code	Code	Description Vo		Markup		Total
			······································	Per Volume	Per Item	
		INTERCHANGE FEES				
	ļ	Merchant Fees				
2,552	FEE	Transaction Fee - L2G			\$1.7500	\$4,466.00

Total Amount Due:

\$4,466.00

Please remit to:

Accounting Department LinkZGov Corporation PO Box 88310 Milwaukee, Wi 53288-0310



LINK2GOV CORP 1 Burton Hills Blvd. Suite #300 Nashville, TN 37215 615.297.2770 fax: 615.297.9407

Remit To: LINK2GOV CORP P.O. Box 88310 Milwaukee, Wt 53288-0310

Invoice

Cestomer; Bearing Point, Inc. ATTN; Terry Stanley Terry Stanley leny.stanley@bearingnoint.com

Involce #: Date:

Period Covered:

20021 9/15/2008 08/01/2008-08/31/2008

EMAIL

P	Marku	Volume	Description	Code	QTY
Per Nem	Per Volume	Agrille	Summary LINKZGOV FEES Period IVR Transaction Fees	TFO	4,518

TOTAL:

\$ 8,081.50



LINK2GOV CORP 1 Burton Hills Bivd. Suite #300 Nachville, TN 37215 890.463.7072 fax: 615.297.8407

Renalt To: LINK2GOV CORP P.O. Box 88310 Milwaukes, Wi 53288-0310

Involce

Customer: Bearing Point, Inc.

Date: Period Covered;

20416 10/6/2008 09/01/08 - 09/30/08

Terry Stanley leny stanley@beading.point.com

email.

QTY	Code	Code Description		Markup		Total
				Per Volume	Per item	
4,528	TFO	LINKZGOV FEES IVR Transaction Fees			\$ 1.7500	\$ 7,924.00
***************************************				TOTAL:	^	\$ 7,924,00

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Andrew A. Jones, Esq. Attorneys for FIS

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:) Chapter 11
BEARINGPOINT, INC., et al.,) Case No. 09-10691 (REG)
Debtors.) (Jointly Administered)
)
)

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of July, 2010, a true and correct copy of Link2Gov Corp's Response to Debtors' Eleventh Omnibus Objection to Proofs of Claim No Liability Claims was served by UPS Overnight Delivery on the parties shown below.

U.S. Bankruptcy Court Southern District of New York Clerk's Office One Bowling Green New York, NY 10004

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